

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

|                          |   |                         |
|--------------------------|---|-------------------------|
| In re: U LOCK INC. a/k/a | ) |                         |
| U-LOCK INC.              | ) | Bankruptcy 22-20823-GLT |
|                          | ) |                         |
| Debtor.                  | ) | Chapter 7               |
|                          | ) |                         |
| -----                    | ) |                         |
| CHRISTINE BIROS,         | ) |                         |
|                          | ) | RE: Order at Entry 36   |
| Movant,                  | ) |                         |
|                          | ) |                         |
| v.                       | ) |                         |
|                          | ) |                         |
| SHANNI SNYDER,           | ) |                         |
|                          | ) |                         |
| Respondent.              | ) |                         |

**DECLARATION OF GEORGE SNYDER**

I, George Snyder, declare and state under the penalty for perjury that the following is true and correct (28 USC 1746):

1. On Saturday, July 9, 2022, I noted a large Big's Waste dumpster on the property. Notably, Big's is the company that caused the garbage truck fire and which the Biros family insinuated I orchestrated.
2. On July 12, 2022, I appeared at the U Lock location. I noticed a backhoe (Case 580 Super L) that belongs to Robert Biros. I saw that tracks existed and that a trailer (one I mentioned at the hearing when I testified) was moved. It was not moved "from" the fire site, but actually onto the fire site. There were divots in the asphalt millings, so it became clear to me that they moved it in a reckless manner. I then inspected the unit. They bent the landing gear and punctured the walls. They moved this trailer without advanced notice.
3. On July 12, 2022, at about 12:30 p.m., a triaxle appeared on the property and dumped large boulders in the front parking lot. Trucks then started coming one after another.
4. About an hour later, Robert Biros, who is Christine Biros' 87 year old father, was running the backhoe and pushing all of the items U Lock temporarily placed outside into a pile with dirt, grass, and asphalt millings.
5. There were several pallets with certain items stacked neatly for storage, such as shelving with an estimated value of about \$12,000 and vintage wood work and some items that belonged to me personally.

6. Christine Biros' brother, Andy, was assisting Robert from the ground. Christine Biros and her son Scotty were also present.
7. More triaxles of large boulders began coming in one after another. They Dumped well over 100 tons of huge boulders right in front of tractor trailers with items stored in them, making it impossible to access or remove anything.
8. Robert Biros also pushed dozens of tons of boulders onto the access road to the storage lockers from the right hand side.
9. The trustee, Mr. Slone showed up while this was going on. I mentioned to him that this doesn't appear to be remediation and that the court order stated they weren't to interfere with U Lock's operation. The trustee stated that it was not clear to him what the judge meant in the Order.
10. Shortly after 3:00 p.m., Robert Biros was ramming his equipment into another tractor trailer attempting to move it. He was not successful in moving it, but he did damage the trailer.
11. On the morning of July 13, 2022, North Huntingdon Township Interim Engineer Robert Robinson met with me and gave me a verbal stop work order. He asked me to email him the property owner information which I did along with a second email asking him if the activities relating to the large rocks were authorized.
12. At around 1:30 p.m., Andy Biros was loading up the back hoe with final drives for excavators and a wood burner.
13. At around 2:15 p.m., I called the trustee and told him things on the schedule were being removed from U Lock.
14. At 2:17p.m., Robert and Andy Biros along with Glenn Mowry, a squatter at the storage facility that has not paid fees for years, were with Hunter towing who was removing a forklift that was on the U Lock schedule along with a diesel fuel tank that was also on the schedule. I did not receive any advanced notice of this.
15. At 2:19pm Glenn Mowry informed me that someone ruined tens of thousands of dollars of his stuff. He also told me that Mr. Slone told him that he can remove his belongings from the property. I told him that I had no say so and to continue to go through Mr. Slone.
16. At 3:52pm, Andy Biros was with Hunter Towing removing a snow plow truck for Glenn Mowry.
17. At some point I called Mr. Slone and told him that there was a verbal stop work order and that Mr. Robinson would be issuing a written one the next day. He said that he would notify Otto.
18. On July 14, 2022, at 9:45am, there were three trucks dumping boulders. I told

them that there was a cease and desist in place. They asked if they could dump there because they had nowhere else to dump. They told me that the big boulders are hard to get rid of because nobody wants to take them. They asked me if they could at least dump those 3 truckloads. I told them that I had no authority to permit them or to deny them. They informed me that they were going to dump them anyway. At that point I left.

19. At 1:34pm Andy Biros was Operating CAT high lift while Bob Biros sat in a white ford transit. Andy Biros was pushing rock and blocking the asphalt road. The tracks on the heavy machine chewed up the asphalt roadway.

20. Throughout the day, the Biros' were using the back hoe and the highlift to scrape and grade the parking lot. They appeared to randomly scrape back and forth and all around displacing any contaminated soil from the fire and spreading and mixing it throughout the rest of the front area and throughout a couple acres of area.

21. Attached is a picture I took of the boulders and dirt that the Biros' brought in to remediate.

22. Also below is a schedule of items damaged by the Biros family.

Dated this 15th day of July 2022.

*/s/ George Snyder*

## SCHEDULE OF ITEMS DAMAGED, DESTROYED, OR DISCARDED WITHOUT NOTICE

### I. Items listed on the bankruptcy schedules

1. *Barrels*
2. *10 Rv tanks*
3. *600 Gallon Tank*

### II. Items Belonging Personally to George Snyder

1. A few pallets of eagle shelving belonging to George Snyder. Valued at \$1,200 each times 8.
2. Pallet of Weight equipment accessories
3. (3) 10 speed bicycles
4. Fiberglass shower surround
5. Vanity mirrored medicine cabinet
6. Store Shelving
7. Bay window
8. Fitness equipment hanging ab straps
9. Washing machine
10. Pallets of brick and stone
11. Building materials
12. Garbage cans
13. Set of Forks for forklifts
14. 2 propane grills

### III. Items belonging to third-parties present on the premises

1. *Motorcycle belonging to tenant*
2. *Tractor belonging to tenant*
3. *Truck Rack*
4. *Vintage chalk/music board*
5. *Vintage podium*
6. *(12) Vintage custom wooden radiator covers*
7. *(8) Vintage solid wooden doors*
8. *(12) Baseboard hot water heaters*
9. *Truck fender*
10. *Truck core support*
11. *Antique custom table with decorative steel base*
12. *Building materials*
13. *Wheel barrow*
14. *Reel lawn mower*
15. *Ceiling fans*
16. *Cooler*
17. *Transmission*
18. *File cabinet*

SOME OF THE BOULDERS AND DIRT BROUGHT BY THE BIROS FAMILY AND  
DUMPED MAKING ACCESS DIFFICULT

